W. Wylie Blair, Esq. 1 **ONDER LAW, LLC** 2 110 E. Lockwood St. Louis, MO 63119 3 Tel: (314) 963-9000 Fax: (314) 963-1700 4 blair@onderlaw.com 5 Attorney for Plaintiffs 6 UNITED STATES DISTRICT COURT 7 NORTHERN DISTRICT OF CALIFORNIA 8 SAN FRANCISCO DIVISION 9 10 IN RE: ROUNDUP PRODUCTS LIABILITY MDL No. 2741 LITIGATION 11 Case No. 3:16-MD-02741-VC 12 This document relates to: 13 Christopher Luetcke v. Monsanto Company, **UNOPPOSED MOTION TO** 14 No. 3:22-CV-03963 MOVE CASES TO WAVE 6 15 Patrick Martin v. Monsanto Company, No. 3:22-CV-03966 16 17 Douglas Moss v. Monsanto Company, No. 3:22-CV-04012 18 Suzanne Norgren v. Monsanto Company, 19 No. 3:22-CV-03967 20 Marty Pinkard v. Monsanto Company, 21 No. 3:22-CV-04011 22 John Schoonover v. Monsanto Company, No. 3:22-CV-03969 23 24 Carol Sorensen v. Monsanto Company, No. 3:22-CV-03971 25 Jack Watson v. Monsanto Company, 26 No. 3:22-CV-03972 27 Robert Whitford, et al v. Monsanto Company, 28 No. 3:22-CV-04014

## **UNOPPOSED MOTION TO MOVE CASES TO WAVE 6**

The nine above-captioned Plaintiffs – without opposition from Defendant Monsanto Company – respectfully request the Court move their cases from Wave 5 to Wave 6.

- 1. Each above captioned Plaintiff is currently situated in Wave 5.
- 2. All parties to this action have diligently pursued discovery, taken and defended depositions, engaged in written discovery and prepared these cases for trial.
- 3. Nevertheless, the impending deadlines, as per the current scheduling order for Wave 5, present challenges to all parties to properly complete discovery.
- 4. When consulting with one another regarding these challenges Plaintiffs' Counsel and Defendant's Counsel believe transferring these cases to Wave 6 would be in the best interests of justice and allow the parties to complete discovery without causing undue delay.

THEREFORE, the nine above-captioned Plaintiffs, without opposition from Defendant Monsanto Company, respectfully request the Court to move their cases from Wave 5 to Wave 6.

Dated: August 26, 2022 ONDER LAW, LLC

By: /s/ W. Wylie Blair

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2	<u>CERTIFICATE OF SERVICE</u>
3	L W W I' DI ' I I W C II A A A A C C Th 2022 L I A C TH C II
4	I, W. Wylie Blair, hereby certify that, on August 26 <sup>th</sup> , 2022, I electronically filed the foregoing with the Clerk for the United States District Court Northern District of California San Francisco Division using the CM/ECF system, which shall send electronic notification to counsel of record.
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7	/s/ W. Wylie Blair
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